

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
SHELTIMAH JACKSON : **VIOLATIONS:**
18 U.S.C. § 1344 (bank fraud - 2 counts)
18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

INTRODUCTION

_____ At all times relevant to this indictment:

1. Wachovia Bank ("Wachovia") was a financial institution insured by the FDIC, certificate number 33869.
2. M.L. was an automotive company which conducted business in Southern New Jersey. M.L. maintained a business bank account at Wachovia.
3. A.B. was a customer of Wachovia who maintained a checking account at Wachovia which had been closed prior to June 21, 2006.
4. From on or about June 21, 2006 through on or about June 30, 2006, defendant

SHELTIMAH JACKSON

knowingly executed and attempted to execute a scheme to defraud Wachovia Bank and to obtain monies owned by and under the care, custody and control of Wachovia by means of false and fraudulent pretense, representations and promises.

THE SCHEME

It was part of the scheme that:

4. Defendant JACKSON obtained, without authorization, a starter check bearing the account number of Wachovia customer A.B. This account had been closed by Wachovia.
5. Defendant JACKSON attempted unsuccessfully to cash the closed account A.B. starter check.
6. Defendant JACKSON obtained, without authorization, six counterfeit commercial checks for the account of M.L. which maintained an account at Wachovia.
7. Defendant JACKSON successfully deposited the six stolen M.L. checks into her bank account, thereby taking \$4,807.75 from Wachovia.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Commerce Bank ("Commerce") was a financial institution insured by the Federal Deposit Insurance Corporation ("FDIC"), certificate number 21140.
2. R.P. was an attorney who operated a law office in Philadelphia. R.P. maintained a trust fund account at Commerce.
3. From on or about June 21, 2006 through on or about June 30, 2006, defendant

SHELTIMAH JACKSON

knowingly executed and attempted to execute a scheme to defraud Commerce and to obtain monies owned by and under the care, custody and control of Commerce by means of false and fraudulent pretense, representations and promises.

THE SCHEME

It was part of the scheme that:

3. Defendant JACKSON obtained a counterfeit check drawn on the law firm trust account of R.P.
4. Defendant JACKSON deposited the counterfeit R.P. check in the amount of \$7,500 into her account at Commerce.
5. Defendant JACKSON withdrew approximately \$5,380.60 of the \$7,500 credited to her account by Commerce before the fraudulent nature of the check was discovered.

All in violation of Title 18, United States Code, Sections 1344 and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1344, as charged in this indictment, defendant

SHELTIMAH JACKSON

shall forfeit to the United States any and all property, real or personal, involved in such offenses, or any property traceable to such property, including, but not limited to a sum of money equal to \$ 10,198.35 in United States Currency.

ii. If any of the forfeitable property, as describe above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;

- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described above.

In violation of Title 18, United States Code, Section 982 (a)(1).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY

